

United States District Court
Southern District of Texas
Corpus Christi Division

Clerk, U.S. District Court
Southern District of Texas
FILED

APR 22 2020

Bobbie David Haverkamp
Plaintiff

David J. Bradley, Clerk of Court

VS.

Civil Action

2:17-CV-18

UTMB Correctional
Manage Health Care
Defendants

Motion to Bring
Forward, Motion for Counsel

To the Honorable Judge of Said Court,

Now Comes

Bobbie David Haverkamp A/K/A the Plaintiff
and moves for reopen Motion for Counsel
that has been on hold. The motion has
never been dismissed, brought forward one
time, then put on Stay.

Argument.

Your Honor, we got some dates
coming up that worries me.

I'll do this by the numbers so nothing gets lost.

- 1) I made the Friday, May 8, 2020 deadline to amend the pleadings. It was just two errors to add and more of a consolidation.
- 2) The next date was Friday July 3, 2020 to get expert designated.
I got two and I'm writing.

Here they are: 1) Dr. Randi Ettner

2) R. Carroll Ph.D.

Trans-Pride is writing them now.

I want to call Dr. Meyers—he's an expert witness on G.I.D. but don't if I can.

The probem Judge, I need an attorney to meet the July 3 deadline.

You know and I know Experts of the caliber want to hear from an Attorney on the case.

So I am requesting one.

You know one of the Corpus Attorneys can do this, it local and really no big expense.

Your Honor if this goes to trial — its going to be a Hot Potato. I know it and you suspect it.

The 5th Circuit got that bunch from Virginia Law School — could you tell me what you got in mind.

With me being lockdown, the State has all the advantage, and I'm stuck out.

Prayer for Relief.

The Plaintiff request a attorney to help with securing expert witnesses for Civil Action 2:14-cv-18. A local attorney can handle this

So prays the Plaintiff

Ms Bobbie. April 19, 2020

Certification.

This was not sent to the Texas Attorney General, its just reopening a existing Motion for Counsel

Ms Bobbie

(3)

April 19, 2020